

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

*In re* Application of: )  
Jeffery Bedell et al. )      Examiner: Chirag Patel  
Serial No.: 09/883,301 )  
Filed: June 19, 2001 )  
For: METHOD AND SYSTEM FOR IMPLEMENTING DATABASE CONNECTION  
MAPPING FOR REPORTING SYSTEMS )  
                                )  
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Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**REQUEST FOR PRE-APPEAL BRIEF REVIEW**

Pursuant to the Pre-Appeal Brief Conference Pilot Program announced in the Official Gazette, Applicant hereby requests a pre-appeal brief conference in the above-referenced case.

In the Office Action of February 8, 2007 (“Action”) finally rejecting claims 1-18, claims 1-5 and 7-11, and 13-17 stand rejected under 35 U.S.C. § 102, and claims 6, 12 and 18 stand rejected under 35 U.S.C. § 103(a). Applicant respectfully traverses these rejections.

**I. RESPONSE TO THE REJECTION UNDER 35 U.S.C. § 102(e)**

The Action finally rejects claims 1-5, 7-11, and 13-17 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Pat. No. 7,062,563 to Lewis (“Lewis”). Applicant respectfully traverses.

In the Response filed November 29, 2006 (“Response”), Applicant argued that Lewis fails to disclose “*controlling access* to at least one database *through a centralized server* wherein the *centralized server maps* the user to at least one appropriate database *based on* the

user request *and* at least one database connection definition" (emphasis added), as recited in claim 1. More specifically, the Response argued that the centralized directory information system 104 of Lewis does not map a user to either the first database 108 or the second database 110 based on a user request and at least one database connection definition. See Response, pp. 6-9.

In contrast, Lewis discloses that when "a user at computer access device 106 seeks to access a first database 108 or a second database 110, 'authentication' information is communicated from access device 106 to the respective database for which access is sought" (emphasis added). See Lewis, FIG. 1, col. 3, ll. 6-10. In other words, the user of Lewis identifies which database to access. Lewis does not disclose that the centralized directory information system 104 maps the user to either of the first database 108 or the second database 110 based on a user request and at least one database connection definition." Hence, the centralized directory information system 104 of Lewis is not mapping the user to a database based on either a user request or a database connection definition.

The Action failed to address these arguments when making the rejection final. See Action, page 2. Instead, the Action relied on previously uncited portions of Lewis to respond to this argument. The newly cited portions of Lewis do not, however, address the above argument and further fail to establish anticipation of claim 1 under 35 U.S.C. § 102(e) in view of Lewis.

In the Response to Arguments, the Action cites Lewis' disclosure of a user desiring to access databases DB1 and DB2. See Action, page 2. The Action also cites Lewis' disclosure of a mechanism "for providing connection links as a current user from a first database to a second database without requiring explicit transmission of authentication credentials in the network link between the databases." See Action, page 2, *citing* Lewis, col. 10, ll. 53-58.

These newly cited portions of Lewis, however, fail to disclose the above-argued features in claim 1. In the sections of Lewis newly cited in the final rejection, Lewis discloses passing a distinguished name (DN) of a current user “from the first database to the second database.” See Lewis, col. 5, ll. 61-62, col. 10, ll. 63-66. Lewis further discloses that the “transmitted DN is used to map the connected user to the appropriate schema at the second database and for authorizing any privileges.” See Lewis, col. 10, line 66 - col. 11, line 2. In other words, the Action is relying on *decentralized databases* in Lewis as anticipating the claimed *centralized server*. Clearly, neither of the first database 108 or the second database 110 of Lewis is a centralized server and neither anticipate claim 1.

Assuming, *arguendo*, that it is reasonable to construe a decentralized database as being a centralized server that controls access to other databases, the decentralized databases of Lewis, however, do not perform the functions of the claimed centralized server.

Claim 1 recites “enabling a user to submit . . . a user request to a reporting system” in combination with “wherein the centralized server maps the user to at least one appropriate database based on the user request and at least one database connection definition.”

In contrast, Lewis discloses that “users at a first database may perform operations that require access to a second database.” See Lewis, col. 9, ll. 54-55. When a first database of Lewis executes a stored object that requires access to a second database, the first database transmits a DN to the second database. See Lewis, col. 10, ll. 63-col. 11, line 3. Lewis explicitly discloses, and the Action cites, that a “transmitted [distinguished name] DN is used to map the connected user to the appropriate schema at the second database and for authorizing any privileges.” See Lewis, col. 10, line 66 - col. 11, line 2. Thus, it is the DN of Lewis, and not the first database, that performs the mapping of the user.

The mapping of Lewis, however, is to map a user to an *appropriate schema* at the second database. See Lewis, col. 10, line 66 - col. 11, line 2.

This is different from the claimed invention for at least the three following reasons.

First, Lewis does not disclose that the DN maps the user to *at least one appropriate database*. The mapping of the DN of Lewis is to a schema, *not* to a database. See Lewis, col. 10, line 66 - col. 11, line 2.

Second, Lewis does not disclose that the mapping of the DN is based on a user request *submitted to a reporting system*. See claim 1, ll. 3-4. The Action does not address this claimed feature and Applicant submits that the Action has not shown that Lewis discloses any such feature.

Third, Lewis does not disclose that the mapping of the DN is based on at least one database connection definition. The Action does not address this claimed feature and Applicant submits that the Action has not shown that Lewis discloses any such feature.

Thus, the Action has failed to establish that Lewis anticipates “*controlling access* to at least one database *through a centralized server* wherein the *centralized server* maps the user to at least one appropriate database based on the user request *and* at least one database connection definition” (emphasis added), as recited in claim 1. Therefore, the Action has failed to show that Lewis anticipates claim 1 under 35 U.S.C. § 102(e).

Accordingly, claim 1 is in condition for allowance and allowance thereof is respectfully requested. Claims 2-5, 7-11, and 13-17 are allowable over Lewis for reasons analogous to those given in support of claim 1.

II. RESPONSE TO THE REJECTION UNDER 35 U.S.C. § 103(a)

The Action finally rejects claims 6, 12, and 18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lewis ("Lewis") in view of Freeman et al. (USPGPUB 2001/0049717). Applicant respectfully traverses.

Claims 6, 12, and 18 depend from claims 1, 7, and 13, discussed above. Claims 6, 12, and 18 are in condition for allowance due to their dependence on an allowable claim.

Accordingly, claims 1-18, are in condition for allowance and allowance thereof is respectfully requested.

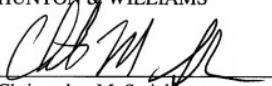
For these reasons, Applicant requests an appeal conference be convened and the claims be allowed.

Applicant authorizes the Director to charge all required fees, fees under 37 C.F.R. §1.17, or all required extension of time fees, to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS

Date: June 8, 2007

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**PRE-APPEAL BRIEF REQUEST  
FOR REVIEW**

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Application Number	<b>09/883,301</b>
Filing Date	<b>June 19, 2001</b>
First Named Inventor	<b>Jeffery Bedell et al.</b>
Art Unit	<b>2141</b>
Examiner Name	<b>Chirag Patel</b>
Attorney Docket No.	<b>53470.003029</b>

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this appeal.

This request is being filed with a Notice of Appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided

I am the:

Applicant/Inventor



Signature

Assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 C.F.R. § 3.73(b) is enclosed. (Form PTO/SB/96).

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06/08/07  
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below\*.

\*Total of \_\_\_\_\_ forms are submitted.